



The Weetabix Company, Inc.



20 CAMERON STREET, CLINTON, MASSACHUSETTS 01510

Mr. Arthur Neal
Director, Program Administration
National Organic Program
USDA-AMS-TMO-NOP
1400 Independence Ave., SW. Room 4008
So., Ag Stop 0268
Washington, DC 20250

August 10, 2005

Email: National.List@usda.gov

Fax: (202) 205-7808

Telephone No. (978) 368-0991

Office FAX No. (978) 365-7268

Lab FAX No. (978) 368-7408

Distribution FAX No. (978) 368-3520

Web Site: www.weetabixusa.com

Reference: National Organic Program, Sunset Review, Docket number TM-04-07

Dear Mr. Neal,

In response to your request for comments for the National Organic Program Sunset Review, please accept **The Weetabix Company's** request that the following substance continue to be allowed for use in organic handling and remain intact on the National List as originally approved.

- **Substance:** Calcium Hydroxide
- **Location on the National List:** Section 205.605(b)

We request this continuation for the following reasons:

1. Calcium Hydroxide has been determined by the National Organic Standards Board (NOSB) to be consistent with the Organic Foods Production Act (OFPA), its implementing regulations and criteria for substances allowed in organic production and handling.
2. Calcium Hydroxide is necessary in the purification of the freshly squeezed cane juice that is concentrated and crystallized to produce the organic sugar that is common in our diet and essential to the formulation, flavor and consistency of the products **The Weetabix Company** produces and sells.
3. **The Weetabix Company** manufactures **Organic Ready-To-Eat Breakfast Cereals** and we are able to make those products because Calcium Hydroxide is allowed for organic sugar processing and that our business's success depends on large part on the consistent and continuous availability of organic sugar.

4. **The Weetabix Company** uses organic sugar in a quantity that qualifies our product(s) for its 95% and above "Organic" status, allowing us to use the **USDA ORGANIC** seal on our labels, which our customers look for and trust.
5. **The Weetabix Company** understands that there are no viable alternatives to Calcium Hydroxide in the production of organic sugar.
6. **The Weetabix Company** understands that Calcium Hydroxide is produced today by the same methods used when it was first placed on the National List in 1995.
7. **The Weetabix Company** is aware of no reason why Calcium Hydroxide should not be allowed for use in organic handling and we confidently support its continued approval.

Thank you very much and please contact us for any additional information.

Sincerely,



Collette McHugh
The Weetabix Company, Inc.
USA



The Weetabix Company, Inc.

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August 15, 2005

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BY APPOINTMENT TO
HER MAJESTY THE QUEEN
MANUFACTURERS OF BREAKFAST CEREALS
WEETABIX LIMITED
BURTON LATIMER



BY APPOINTMENT TO
HIS MAJESTY THE QUEEN MOTHER
MANUFACTURERS OF BREAKFAST CEREALS
WEETABIX LIMITED
BURTON LATIMER



BY APPOINTMENT TO
HIS MAJESTY THE PRINCE OF WALES
MANUFACTURERS OF BREAKFAST CEREALS
WEETABIX LIMITED
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Dear Mr. Neal and National Organic Standards Board:

This letter is in reference to the National Organic Program, Sunset Review, Docket number TM-04-07. The Weetabix Company, Inc. (USA) supports the continued allowance of the following substance(s):

Name of Substance	Location on National List	Reason for continued allowance.	Supporting Documents (example: research data or other international organic programs)
Calcium Carbonate	§ 205.605(a)	Source of calcium - (produced from quarried limestone)- recommended for nutrient fortification by The Committee on Food Standards and Fortification Policy of the National Academy of Sciences / National Research Council.	[DOC #1] 21 CFR Part 100 <i>Fortified Ready-To-Eat Breakfast Cereals Proposed Nutritional Quality Guidelines</i> , Federal Register June 14, 1974.
Chlorine Materials	§ 205.605(b)	Cleaning agents- used in product zone cleaning, to disinfect & sanitize food contact surfaces; to protect food from potential microbial contamination, ensuring that food is fit for human consumption.	[DOC #2] 21 CFR §110.35 (d) <i>Sanitation of food-contact surfaces</i> . Current Good Manufacturing Practice in Manufacturing, Packing, or Holding Human Food.

THE WEETABIX COMPANY, INC. USA (CONT.)

Lecithin - bleached	§ 205.605(b)	Process aid - with no known organic alternative – necessary to prevent sticking of cooked whole grains in the processing of Ready-To-Eat Breakfast Cereals; Conforms with NOSB <i>Recommendations for Use of Synthetic Materials</i> .	[DOC #3] NOSB Interdisciplinary Committee on Processing Principles: <i>Recommendations for use of Synthetic Materials</i> USDA/NOSB Meeting February 9-11, 1999. Washington, DC.
Nutrient Vitamins & Minerals	§ 205.605(b)	Nutritional fortification- recommended by The Committee on Food Standards and Fortification Policy of the National Academy of Sciences / National Research Council to provide the appropriate fortification for Ready-To-Eat Breakfast Cereals.	[DOC #1] 21 CFR Part 100 <i>Fortified Ready-To-Eat Breakfast Cereals: Proposed Nutritional Quality Guidelines</i> , Federal Register June 14, 1974. [DOC #4] NOSB <i>Final Recommendation Addendum Number 13: The Use of Nutrient Supplementation in Organic Foods</i> . October 31, 1995.
Tocopherols	§ 205.605(b)	(Vitamin E) Antioxidant - with no known organic alternative – necessary to prevent/retard oxidative rancidity of lipids in processed Ready-To-Eat Breakfast Cereals; Conforms with NOSB <i>Recommendations for Use of Synthetic Materials</i> .	[DOC #3] NOSB Interdisciplinary Committee on Processing Principles: <i>Recommendations for use of Synthetic Materials</i> USDA/NOSB Meeting February 9-11, 1999. Washington, DC.

A copy of this letter, including all documents referenced, will be sent by mail (postmarked by 8/16/05).

Sincerely,



Collette McHugh
The Weetabix Company, Inc.
USA

Cc: Organic Trade Association
National Organic Standards Board